

Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, DC 20554

April 27, 2012

In the Matter of	)	
	)	
Lifeline and Link Up Reform and Modernization	)	WC Docket No. 11-42
	)	
Lifeline and Link Up	)	WC Docket No. 03-109
	)	
Federal-State Joint Board on Universal Service	)	CC Docket No. 96-45
	)	
	)	WC Docket No. 12-23
Advancing Broadband Availability Through Digital Literacy Training	)	

Dear Sir/Madame:

I am writing today in response to the FCC's Notice of Proposed Rulemaking which, among other things, proposes a Digital Literacy Pilot to fund schools and libraries operating digital literacy training courses. Before delving into my response to the proposed pilot, I want to first thank the FCC for your continued support for the E-Rate program. The E-Rate program provides critical discounts to assist public libraries like Raleigh County Public Library System to obtain affordable telecommunications and internet access.

The E-Rate program has greatly benefited the libraries in West Virginia. In particular, affordable access to the internet has allowed my staff to teach our patrons to fill out online job applications; email résumés and search for employment opportunities both locally and globally. It allows our patrons to access databases for research, as well as to communicate with family members stationed overseas. In an economically depressed area such as southern West Virginia, many homes do not have a computer and those that do access the internet through a dial-up connection. E-Rate has positively impacted our area and helped to "level the playing field" for both our student population and workforce.

The proposed pilot would provide grants to K-12 schools and libraries, lasting four years, to hire trainers, conduct training courses and provide resources/materials to those who lack digital literacy skills. While the FCC does not propose to fund the pilot using E-Rate funds, it does propose implementing and administering the program through the same division that oversees the E-Rate program. Specifically, the FCC proposes implementing and administering the program through the Schools & Libraries Division of the Universal Service Administrative Company (USAC).

I am concerned that operating the pilot through E-Rate will undermine the important and ongoing work of E-Rate, causing delays in the program's application and appeal processes, creating auditing problems and results in problematic precedents for E-Rate's eligible services. **Specifically, I oppose the proposal to operate/administer the proposed pilot through the E-Rate program.** The E-Rate Program is already oversubscribed and underfunded. To divert resources away from the program before it has met its stated goals will lead to a negative rather than a positive impact on communities. I am opposed to running the Pilot funds through federal agencies that administer non-Universal Service Fund programs. I have concerns that

doing so would establish a precedent for mixing USF funds with appropriated fund. This mingling of funds could result in a diversion of critical funding from rural areas such as mine that are already in dire economic hardship.

Thank you for considering my response as you move forward with your decision on the Digital Literacy Pilot. I applaud the FCC for its continued efforts to protect the already oversubscribed E-Rate program by not funding the pilot with E-Rate funding. I urge you to take similar protective measures when it comes to the implementation and administration of the pilot; please ensure that critical, limited E-Rate resources—both fiscal and administrative—are protected.

Respectfully,

Amy E. Lilly  
Director, Raleigh County Public Library System  
Beckley, WV